

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In re: Nicholas J. Rivelli Debtor Ditech Financial LLC Movant v. Nicholas J. Rivelli Debtor/Respondent William C. Miller, Esquire Trustee/Respondent	Bankruptcy No. 19-11538-elf Chapter 13 Hearing Date: 11/19/19 Hearing Time: 9:30 am Location: Courtroom Number #1 Philadelphia Division/Nix Building
---	---

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Ditech Financial LLC., has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1) with respect to the Property located at **20 Hickory Drive, #B1, Horsham, Pennsylvania 19044** and for such other and further relief as to the Court may deem just and proper.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the Motion** or if you want the court to consider your views on the motion, then on or before November 11, 2019, **you or your attorney must filed a response to the Motion.** (*see Instructions on next page*).

- (a) File an answer explaining your position at:

Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough that it will be received on or before the dates stated above; and

- (b) Mail a copy to the movant's attorney:

Harold Kaplan, Esquire
Bar ID: 38110
130 Clinton Road, Lobby B, Suite 202
Fairfield, NJ 07004
Telephone: 973-575-0707
Facsimile: 973-404-8886
Email: hkaplan@rasnj.com

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 19(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
3. **A hearing on the Motion** is scheduled to be held before **Judge Eric L. Frank** on **November 19, 2019, at 9:30 am in Courtroom 1, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107**. Unless the court orders otherwise, the hearing on this contested matter will be an **evidentiary hearing**.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
5. You may contact the Bankruptcy Clerk's Office in Philadelphia at 215-408-2800 or Reading at 610-208-5040 to find out whether the hearing has been canceled because no one filed a response.

Date: October 30, 2019

RAS Crane, LLC
10700 Abbott's Bridge Road, Suite 170
Duluth, GA 30097
Phone: 470-321-7112 x 221
Fax: 404-393-1425

By: /s/ Kevin Buttery
Kevin M. Buttery Esquire
Bar ID: 319438
Email: kbuttery@rascrane.com